

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA**

GRADY O. HUMPHREYS, et al.,)
)
Plaintiffs,)
)
v.)
)
A.O. SMITH ELECTRICAL PRODUCTS, COMPANY, et al.,)
)
Defendants.)

DEFENDANT P&H MINING'S CONFLICT DISCLOSURE STATEMENT

COME NOW the Defendants, incorrectly designated as Harnischfeger Corporation and P&H Crane and more properly identified as P&H Mining Equipment, Inc., and in accordance with the order of this Court, making the following disclosure concerning parent companies, subsidiaries, partners, limited liability entity members and managers, trustees (but not trust beneficiaries), affiliates, or similar entities reportable under the provisions of the Middle District of Alabama's General Order No. 3047:

- This party is an individual, or
- This party is a governmental entity, or
- There are no entities to be reported, or
- The following entities and their relationship to the party are hereby reported:

REPORTABLE ENTITY

P&H Mining Equipment, Inc.

RELATIONSHIP TO PARTY

A wholly owned subsidiary of Joy Global, Inc., a publicly traded company, is the appropriate legal entity of the Defendants designated as Harnischfeger Corporation and P&H Cranes

August 6, 2007

Date

s/William T. Mills, II

William T. Mills, II
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**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA**

GRADY O. HUMPHREYS, et al.,)
)
Plaintiffs,)
) **Civil Action Number:**
v.)
) **2:07-CV-607-WKW**
A.O. SMITH ELECTRICAL PRODUCTS,)
COMPANY, et al.,)
)
Defendants.)

CERTIFICATE OF SERVICE

I hereby certify that on August 6, 2007, I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send a copy of the document to all parties of record.

Respectfully submitted,

s/**William T. Mills, II**
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